

NWOD Ambient Air Monitoring Plan

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Dear Liz and Kathy,

The Working Group has revised the Air Monitoring Plan based on the input received during our meeting with EPA/UDEQ during our meeting on August 22nd. In particular, we considered the suggestions provided by Scott Everett and reached the following conclusions, which are explained in the "Regulatory Guidelines" section of the plan:

- The Working Group reviewed the option for using the EPA Regional Screening Levels (RSLs) instead of the MRLs. We found the RSLs to be more stringent than the MRLs for the hydrocarbon compounds of interest in the NWOD canal. Also, the RSLs are geared toward indoor air exposures and life-time (e.g., 30 year) exposure scenarios that are not reflective of the sediment removal project. Therefore, we have retained the MRLs as comparison criteria for the canal project.
- The Working Group considered measurements of hydrogen sulfide (H₂S) concentrations as part of the field monitoring program. We found that the available field instrument to be used for the project can appropriately measure H₂S at levels sufficient for health and safety protection for workers (e.g., 1-10 ppm or greater); however, this instrument cannot be used for comparison to MRLs at much lower concentrations. The diffusion sampling equipment to be used for VOC detections cannot be used for H₂S, and this chemical has not been observed historically in the sediment. Therefore, we do not propose to include it in the air monitoring program.

We appreciate the agencies' input on this matter; please let us know if you have further questions.

Thank you,

Laura

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